

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re: Oleg Khutoretskiy  
Debtor

Case Number 22-42697

In re: Irina Khutoretskaya  
Debtor

Chapter 7

Affidavit in Support of Motion for Relief from the Automatic Stay

I, Jeremy Doppelt, the Manager of JDRM LLC DBPP, SM, SKP & JD LLC, (Hereinafter "Secured Creditor"), duly sworn depose and say:

1. I am the Manager of the Secured Creditor am authorized to submit this declaration on behalf of Secured Creditor. JDRM LLC DBPP, SM, SKP & JD LLC is the entity that has the right to foreclose by virtue of being holder of the note.
2. I have reviewed the business records of the Secured Creditor, including but not limited to the personal knowledge, books, files, electronic data, memorandum or records of any act, transaction, occurrence or event, made in the regular course of business and that it was the regular course of such business that these records be made, at the time of the act, transaction, occurrence or event, or within a reasonable time thereafter.
3. Irina Khutoretskaya executed a Note (See Exhibit "A") and Mortgage in favor of the mortgagee to secure the repayment of loan as against the property commonly known as 115 Baden Place, Staten Island, New York 10306. (See Exhibit "B.")
4. JDRM LLC DBPP, SM, SKP & JD LLC is a creditor by virtue of the fact that the note was transferred by way of an allonge. (See Exhibit "A."). The Mortgage passes as an incident to the note.
5. The Debtor(s) filed a bankruptcy petition in this Court, which stayed all further action by the Secured Creditor.
6. Irina Khutoretskaya has failed to make any payment to Secured Creditor on the Property since October 1, 2017.

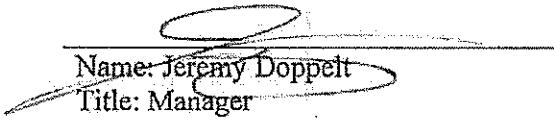
7. Mortgage arrearage has accumulated for the monthly installments of:

Months	Amount of Payment	Total
11/01/2017 – 09/01/2018	\$2,908.36 per month	\$31,991.96
10/01/2018 – 09/01/2019	\$3,915.37 per month	\$47,416.44
10/01/2019 – 09/01/2020	\$3,815.06 per month	\$45,780.72
10/01/2020 – 09/01/2021	\$3,469.87 per month	\$41,638.34
10/01/2021 – 09/01/2022	\$3,425.35 per month	\$41,104.20
10/01/2022 – 11/01/022	\$3,771.12 per month	\$7,542.24
Total Amount Due		\$230,920.86

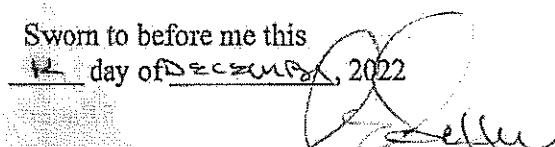
8. A recent Appraisal/Broker's Price Opinion for the property known as 115 Baden Place, Staten Island, New York 10306 is attached hereto as Exhibit "C."

9. The amount due and owing under the mortgage as of November 30, 2022 581,233.48.

JDRM LLC DBPP, SM, SKP & JD LLC

  
Name: Jeremy Doppelt  
Title: Manager

Sworn to before me this  
12 day of December, 2022

  
Notary Public

Leslie Shaw  
NOTARY PUBLIC  
State of New Jersey  
ID # 50130354  
My Commission Expires 6/30/2024

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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RELIEF FROM STAY – REAL ESTATE AND  
COOPERATIVE APARTMENTS

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1. Address of Real Property or Cooperative Apartment: 115 Baden Place, Staten Island, New York 10306
2. Lender Name: JDRM LLC DBPP, SM, SKP & JD LLC
3. Mortgage Date: August 2, 2005
4. Post-Petition Payment Address: SN Servicing Corporation, 323 5th Street Eureka, CA 95501

**DEBT/VALUE REPRESENTATIONS**

5. Total Pre-Petition and Post-Petition indebtedness of Debtor(s) to Secured Creditor as of the Motion Filing Date: \$581,233.48 (Note: this amount may not be relied on as a “payoff” quotation.)
6. Secured Creditor’s estimated market value of the Real Property or Cooperative Apartment as of December 8, 2022: \$804,585.00
7. Source of estimated valuation: Broker’s Price Option and/or Appraisal
8. Debtor’s Indebtedness to Secured Creditor as of the Petition date:

A. Total:	\$581,233.48
B. Principal:	\$437,187.01
C. Interest:	\$91,546.50
D. Escrow (Taxes and Insurance)	\$15,446.86
E. Forced Placed Insurance expended by Secured Creditor:	\$0.00
F. Pre-Petition Attorneys’ Fees Charged to Debtor(s)	\$0.00
G. Pre-Petition Late Fees charged to Debtor(s):	\$0.00
9. Contractual Interest Rate: 4.25%
10. Other Pre-Petition fees, charges or amounts charged to Debtor(s)’s account and not listed above: \$37,053.11

## AMOUNT OF POST-PETITION DEFAULT AS OF THE MOTION FILING DATE

11. Date of receipt of last payment: October 1, 2017
12. Number of payments due from petition date to motion filing date: N/A
13. Post-Petition payments in default: 1

Payment Due Date	Amount Due	Amount Received	Amount Applied to Principal	Amount Applied to Interest	Amount Applied To Escrow	Late Fee Charged
11/01/2022	\$3,771.12	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL:</b>	<b>\$3,771.12</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

14. Other Post-Petition fees charged to Debtor(s):
  - A. Total: \$0.00
  - B. Attorneys' fees in connection with this motion: \$0.00
  - C. Filing Fee in connection with this motion: \$0.00
  - D. Other Post-Petition Attorneys' fees: \$0.00
  - E. Post-Petition inspection fees: \$0.00
  - F. Post-Petition Appraisal/Broker's Price Opinion Fees: \$0.00
  - G. Forced placed insurance expended by Secured Creditor: \$0.00
15. Amount held in suspense by Secured Creditor: \$0.00
16. Other Post-Petition fees, charges or amounts charged to Debtor(s)'s account and not listed above:

## REQUIRED ATTACHMENTS TO MOTION

Please attach the following documents to this motion and indicate the exhibit number associated with the documents.

(1) Copies of documents that establish Secured Creditor's interest in the subject property. For purposes of example only, this may be a complete and legible copy of the promissory note or other debt instrument together with a complete and legible copy of the mortgage and any assignments on the chain from the original mortgagee to the current moving party. (Exhibit A and B)

(2) Copies of documents establish Secured Creditor's standing to bring this motion. (Exhibit A and B)

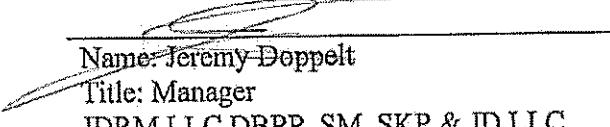
(3) Copies of documents that establish that Secured Creditor's interest in the real property or cooperative apartment was perfected. For the purposes of example only, this may be a complete and legible copy of the financing statement (UCC-1) filed with the Clerk's office or the register of the county in which the property or cooperative apartment is located, (Exhibit n/a)

I, Jeremy Doppelt, the Manager of JDRM LLC DBPP, SM, SKP & JD LLC the Secured Creditor herein, declare pursuant to 28 U.S.C. Section 1746 under penalty of perjury that the information

provided in this form and any exhibits attached hereto (other than the transactional documents attached as required by paragraph 1, 2 and 3, above) is derived from records that were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; that the records were kept in the course of the regularly conducted activity; and that the records were made in the course of the regularly conducted activity as a regular practice.

I further declare that copies of any transactional documents attached to this form as required by paragraph 1, 2, and 3, above, are true and correct copies of the original documents.

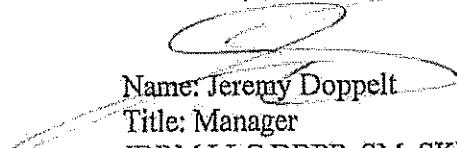
Executed at  
On this 12 day November, 2022

  
Name: Jeremy Doppelt  
Title: Manager  
JDRM LLC DBPP, SM, SKP & JD LLC  
Street Address: 141 Hawkins Pl.  
City, State, Zip Code: Boonton, N.J. 07005

#### DECLARATION AS TO BUSINESS RECORDS

I, Jeremy Doppelt, the manager of JDRM LLC DBPP, SM, SKP & JD LLC, the Secured Creditor herein, declare pursuant to 28 U.S.C. Section 1746 under penalty of perjury that the foregoing is true and correct based on personal knowledge of the Secured Creditor's books and business records.

Executed at  
On this 12 day November, 2022

  
Name: Jeremy Doppelt  
Title: Manager  
JDRM LLC DBPP, SM, SKP & JD LLC  
Street Address: 141 Hawkins Pl.  
City, State, Zip Code: Boonton, N.J. 07005